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5 Attorneys for Creditor/Movant  
6 T.L. MEADOWS, LLC

7  
8 UNITED STATES BANKRUPTCY COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10 SACRAMENTO DIVISION

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12 IN RE:

13 ROCKLIN FAMILY ENTERTAINMENT,  
14 LLC,

15 Debtor.

Case No. 2010-51840-A-11

Chapter 11

DCN: TF-1

16 **MOTION TO CONVERT TO CHAPTER 7  
CASE OR ALTERNATIVELY, TO  
DISMISS FILED BY TL MEADOWS, LLC**

17 Date: January 14, 2011  
18 Time: 10:00 a.m.  
19 Dept.: Dept. A; Courtroom 28  
20 Judge: Honorable Michael S. McManus.  
Location: U.S. Bankruptcy Court, 6<sup>th</sup> Floor  
501 I Street, Sacramento California

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22 Movant TL MEADOWS, LLC, hereby moves to convert the Chapter 11 bankruptcy to a  
23 Chapter 7 case, or in the alternative, moves to dismiss the bankruptcy.

24 This motion to convert is brought pursuant to Bankruptcy Code section 1112(b)(1) as it is  
25 in the best interests of creditors and the estate to convert this Chapter 11 petition to a Chapter 7  
26 and there is cause due to the substantial and continuing loss to the estate with no reasonable  
27 likelihood of rehabilitation. (11 U.S.C. § 1112(b)(4)(A).) Given the significant debt owed by  
28 Debtor including the loan, outstanding leasehold obligations and taxes, Debtor will need a

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significant influx of cash to reorganize and such financing will not reasonably be available to this Debtor. In the alternative, Movant seeks to dismiss the case on the same grounds as conversion. (11 U.S.C. § 1112(b).)

Dated: December 17, 2010

TRAINOR FAIRBROOK

By: /s/ Jennifer L. Pruski  
JENNIFER PRUSKI